



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029



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2232359

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February 24, 2005

Mr. George M. Kickel  
Manager, Environment, Safety & Health  
Lord Corporation  
2000 west Grandview Blvd.  
P.O. Box 10038  
Erie, PA 16514-0038

**RE: Lord-Shope Landfill Superfund Site  
In-Situ Vapor Stripping System  
Tentatively Identified Compounds**

Dear Mr. Kickel:

This is in response to your letter to me dated January 31, 2005 in which you requested that EPA evaluate the possibility of eliminating tentatively identified compounds (TICs) from Lord Corporation's monthly remedial action (RA) reports. EPA air quality experts have studied the table of values relating to the onsite thermal oxidizer that you submitted with the January 31 letter. They have also reviewed the laboratory reports for February 2004 and November 2004 that you submitted under a cover letter dated February 10, 2005.

EPA believes that phosgene is being created in the thermal oxidizer and is the main component in the TICs that are evident in the effluent of the oxidizer. Phosgene is likely the cause of the lower destruction efficiencies evident when TICs are included in the destruction efficiency calculations. As such, EPA recommends that:

1. Lord Corporation switch to EPA Method TO-15 from the current Method TO-14 so that phosgene and other compounds that are in the influent and effluent of the thermal oxidizer may be formally identified and quantified. (Method TO-15 detects more compounds than Method TO-14.)
2. Lord Corporation use a laboratory that is certified in the use of EPA Method TO-15 to analyze the air samples.
3. Lord Corporation include the air sampling laboratory reports as part of the RA Monthly Progress Reports.



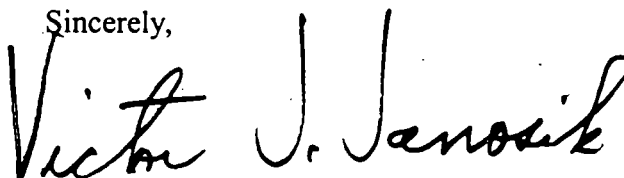
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4. Lord Corporation continue to include TICs in the destruction and efficiency calculations. For comparison purposes, Lord Corporation may, in addition, submit calculations without the use of TICs, if Lord so chooses.

EPA believes that if the TICs are better characterized using Method TO-15 over several reporting periods, we then will be in a better position to evaluate the possible elimination of TICs in the destruction and efficiency calculations and in the monthly reporting.

Please call me at 215-814-3217 if you would like to discuss these matters further.

Sincerely,

A handwritten signature in black ink, reading "Victor J. Janosik". The signature is written in a cursive style with a large, stylized "V" and "J".

Victor J. Janosik  
Remedial Project Manager